

From: rosemariez@juno.com
Sent: Tuesday, May 02, 2006 10:11 AM
To: Frances, Valerie
Subject: Re: Docket # TM-05-14 National Organic Program - Access to Pasture (Livestock)

USDA NOP Docket# TM-05-14
1400 Independence Ave, SW
Room 4008-So, Ag Stop 0268
Washington, DC 20250

Dear USDA NOP Docket# TM-05-14,

I am writing to comment on the advanced notice of proposed rulemaking regarding the National Organic Program's regulations on access to pasture in organic milk production (Docket # TM-05-14).

As a consumer, I expect that the organic milk I purchase comes from cows that have been raised on pasture - not from a factory farm where animals are confined. Industrial-style confined dairy feedlots have no place in an organic program and only serve to erode consumer confidence in the organic standards. Such operations also threaten the livelihoods of family farmers who adhere to true organic principles.

According to an April 2006 poll commissioned by the Center for Food Safety I am not alone in these expectations. The new national poll indicates that most (51% overall, and 61% of women) U.S. organic milk purchasers would stop buying organic milk after learning that some organic dairy companies do not allow significant access to pasture for their dairy cows. The poll suggests that if the USDA does not require stringent regulations that organic cows be raised for a significant period of time outdoors and on pasture, there could be substantial erosion of the organic milk market.

Organic dairy feed lots, with thousands of confined dairy cows, do not reflect what consumers want from the National Organic Program. I urge the USDA NOP to adopt a mandatory verifiable regulatory requirement for pasture that clearly excludes confined animal feeding operations (CAFOs).

At a minimum, the new standard should contain the suggestions for regulatory amendments made by the National Organic Standards Board (NOSB) regarding pasture requirements in its Draft Recommendations of Nov. 17, 2005. In addition, I strongly support the NOSB's proposal to close the existing loophole that allows dairy animals that are lactating to be confined.

I hope that the agency will move quickly to adopt these changes and maintain my confidence in the organic milk I purchase and the organic standards that I, and so many others, have come to trust.

Sincerely,

Rosemarie Zellers
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Albuquerque, New Mexico 87112